

# **Public Teleconference Regarding Request for Alternative to the Requirements in American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, IWA-5211, for the Waterford Steam Electric Station, Unit 3**

April 17, 2018, 3:00 p.m. to 4:00 p.m.

By letter dated February 20, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18051B559), Entergy Operations, Inc. submitted a Request for Alternative to the system pressure test requirements in the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, IWA-5211 for the Waterford Steam Electric Station, Unit 3 (Waterford 3). The U.S. Nuclear Regulatory Commission (NRC) staff has identified several topics for discussion regarding the submittal, as follows:

1. Citation of the relevant regulation under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 to provide the regulatory basis of the proposed alternative: The licensee submitted the request pursuant to 10 CFR 50.55a(z)(1), which addresses the demonstration of an acceptable level of quality and safety. However, in its submittal, the licensee justified the proposed alternative by stating that adherence to the Code (IWA-5211) requirements would result in declaration of inoperability of the containment ventilation area system (CVAS) trains per Waterford 3 Technical Specification 4.7.7.d.2. The NRC staff considers that this justification is more properly characterized as hardship without a compensating increase in the level of quality and safety, which is addressed in 10 CFR 50.55a(z)(2). This view is also consistent with the previous safety evaluation regarding the licensee's essentially identical request for the Waterford 3 third inservice inspection interval (ADAMS Accession No. ML103570392).
2. Clarification as to whether temporary access through block-out sections is provided during the proposed VT-2 visual examination.
3. Discussion of the following items:
  - a) Susceptibility evaluation of degradation mechanisms (e.g., stress corrosion cracking and thermal fatigue) for the subject piping and
  - b) Operating experience, including inspection results, which potentially indicate any previous occurrence of degradation in the subject piping.